

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

<p>SYMBIONT SCIENCE, ENGINEERING AND CONSTRUCTION, INC., ZURICH AMERICAN INSURANCE COMPANY a/s/o Symbiont Science, Engineering and Construction, Inc.; AMERICAN GUARANTEE AND LIABILITY INSURANCE COMPANY, a/s/o Symbiont Science, Engineering and Construction, Inc. and STEADFAST INSURANCE COMPANY a/s/o Symbiont Science and Construction, Inc.</p>	<p>Honorable Robert Kirsch, U.S.D.J. Honorable J. Brendan Day, U.S.M.J. C.A. No.: 3:22-cv-04905-RK-JBD NOTICE OF MOTION TO INTERVENE</p>
<p>Plaintiffs vs. GROUND IMPROVEMENT SERVICES, INC.; JOHN DOES 1-10, (fictitious parties) and ABC COMPANIES 1-10 (fictitious parties); GEOSTRUCTURES OF VIRGINIA, INC. Defendants.</p>	

TO: Honorable Robert Kirsch, U.S.D.J.
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

All Counsel of Record

PLEASE TAKE NOTICE that on October 16, 2023 at 9:00 a.m. or as soon thereafter as counsel may be heard, proposed intervenor Denali Water Solutions LLC, through its counsel, Fox Rothschild LLP, shall move before the above-named Court to intervene in the above-captioned matter. The proposed intervenor will rely on the attached brief, certification of counsel, and attached exhibits. A proposed form of order is also attached.

Date: September 12, 2023

/s/ Jeffrey M. Pollock

Jeffrey M. Pollock, Esq.

Steven J. Link, Esq.

Dominique J. Carroll, Esq.

Fox Rothschild LLP

Princeton Pike Corporate Center

997 Lenox Drive

Lawrenceville, NJ 08648-2311

Attorneys for proposed intervenor,
Denali Water Solutions LLC